

District Judge Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

E.L.A. and O.L.C.,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. C20-1524-RAJ

STIPULATED MOTION FOR ORDER OF
60-DAY ABEYANCE

NOTE ON MOTION CALENDAR:
JULY 8, 2021.

The Parties, by and through the undersigned counsel, jointly stipulate and move the Court for a 60-day abeyance of this matter.

The United States, along with a group of counsel who are coordinating negotiations on behalf of plaintiffs and claimants, are engaged in a nationwide effort to settle district court cases and pending administrative tort claims arising from family separations at the U.S./Mexico border that occurred during the prior administration. While significant progress has been made, due to the scale and complexity of the effort, additional time is needed to achieve a global resolution of these matters.

Currently pending before the Court is Defendant's motion to transfer and partial motion to dismiss. Dkt. No. 15. Further, the Court has scheduled a telephone conference for July 23, 2021, regarding those motions. Holding this matter in abeyance will preserve judicial resources

1 due to the Court not having to unnecessarily hear argument or rule on the pending motions while
2 settlement talks progress in earnest.

3 Therefore, the parties stipulate and agree that good cause exists for an Order:

4 1. Holding this matter in abeyance for 60 days until September 8, 2021, including
5 staying Defendant's pending motion to transfer and partial motion to dismiss during that time;

6 2. That, if this matter is not settled by September 8, 2021, the parties will jointly
7 update the Court and either seek an additional abeyance or continue the litigation.

8 Respectfully submitted,

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16 **NORTHWEST IMMIGRANT RIGHTS**
17 **PROJECT**

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Attorneys for the United States

ORDER

IT IS SO ORDERED.

Dated this _____ day of _____, 2021.

The Honorable Richard A. Jones
United States District Judge